IN THE UNITED STATES DISTRICT BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS

FOR THE SOUTHER	N DISTRICT OF TEXAS Mallan Ochsones Clerk of College BANKRUPTCY CASE No. 24-30855	
Joanna Burke,) BANKRUPTCY CASE No.	
Plaintiff		
v.	ADVERSARIAL CASE No. 24-03056	
Deutsche Bank National Trust Company, PHH Mortgage Corporation, AVT Title Services, LLC, DOES 1-10	PLAINTIFF'S REQUEST FOR CLERK'S ENTRY OF DEFAULT AGAINST	
Defendants	DEFENDANTS	
)	

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE JEFFREY P. NORMAN AND ALL INTERESTED PARTIES:

Pursuant to Fed. R. Bankr. P. 7055 and Fed. R. Civ. P., Rule 55(a), Joanna Burke, Plaintiff in the above-referenced adversary proceeding and in the above-referenced bankruptcy case (the "Plaintiff"), requests that you enter the default of Defendants AVT Title Services, LLC, Deutsche Bank National Trust Company and, PHH Mortgage Corporation. for failure to appear, answer, plead in or otherwise defend this action as stated in the Declaration of Joanna Burke in Support of Request for Clerk's Entry of Default Against Defendants filed contemporaneously herewith.

WHEREFORE, Plaintiff respectfully requests that the Clerk of the Bankruptcy Court enter default against named Defendants.

RESPECTFULLY submitted this 27^{th} day of May, 2024.

Joanna Burke, Harris County

Joanna Bruske

State of Texas / Pro Se

46 Kingwood Greens Dr

Kingwood, Texas 77339

Phone Number: (281) 812-9591

Fax: (866) 705-0576

Email: joanna@2dobermans.com

IN THE UNITED STATES DISTRICT BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS

Joanna Burke, Plaintiff v.) BANKRUPTCY CASE No. 24-30855		
) ADVERSARIAL CASE No. 24-03056		
Deutsche Bank National Trust Company, PHH Mortgage Corporation, AVT Title Services, LLC, DOES 1-10	CLERK'S ENTRY OF DEFAULT		
Defendants)		
)		

The Clerk for the United States Bankruptcy Court for the Southern District of Texas, having reviewed the adversary docket in the above—styled and numbered matter, and having received the Affidavit of the Plaintiff in this cause, and having found that no answer, motion, pleading, response, or appearance has been entered by or on behalf of Defendants AVT Title Services, LLC, Deutsche Bank National Trust Company and PHH Mortgage Corporation, hereby notes and dockets a Clerk's Entry of Default in the above—captioned adversary proceeding.

For the Court, this day	of	, 2024

Case Manager to Judge Jeffrey P. Norman Bob Casey United States Courthouse 515 Rusk, Room 403 Houston, Texas 77002 United States Courts
Southern District of Texas
FILED

JUN 4 2024

Nathan Ochsner, Clerk of Court

Date: May 27, 2024

Re: Burke v. Deutsche Bank National Trust Company, 24-03056, (Bankr. S.D. Tex.)

Dear Sir or Madam,

JOANNA BURKE'S FILINGS IN THIS CASE

Please find enclosed the following documents:-

- 1. PLAINTIFF'S REQUEST FOR CLERK'S ENTRY OF DEFAULT AGAINST DEFENDANTS
- 2. PLAINTIFF'S DECLARATION IN SUPPORT OF REQUEST FOR DEFAULT JUDGMENT AGAINST DEFENDANTS
- 3. CLERK'S ENTRY OF DEFAULT

Due to the recent unexplained delays in USPS Priority Mail arriving at this court, I would kindly ask that you provide a hearing date on the above pleadings.

If you have any questions, please contact me at the information below. Thank you.

Sincerely,

Joanna Burke

46 Kingwood Greens Dr., Kingwood, TX, 77339

Email: joanna@2dobermans.com

Tel: (832) 466-9015

Fax: +1 (866) 705-0576

Encls.